

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DIANA COREA, SINDY PINEDA, ISAAC
RUNCIMAN, AMPARO CHAUCA, LAOS
CARDOSO, AND JUANA CRUZ, Individually
and on behalf of all others similarly situated as
Class Representatives,

Plaintiffs,

v.

CAFÉ SPICE {GCT}, INC. A/K/A CAFÉ
SPICE INC. A/K/A CAFÉ SPICE GLOBAL
CUISINE A/K/A ZAIKA FLAVORS OF
INDIA; SUSHIL MALHOTRA; SAMEER
MALHOTRA; PAYAL MALHOTRA; AND
VIRGILIO FELIX,

Defendants.

DECLARATION

Civil Action No. 7:18-cv-10354-KMK

COLLECTIVE AND CLASS ACTION

CERTIFICATION OF COSTS

I, Diana Saguilan, affirm that the following is true and correct under the penalty of perjury that the following costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed:

1. I am employed at the Worker Justice Center of New York, Inc., (“WJCNY”) Class Counsel for Plaintiffs in this matter and serve as the Director of Operations & Finance and as such am fully familiar with the facts and circumstances of this action.
2. In my role as Director of Operations & Finance I work with WJCNY’s accountant to track and record expenses. I also regularly input and track WJCNY’s expenditures using Intuit

Quickbooks accounting software.

3. In preparation of WJCNY's application for costs and fees I have reviewed WJCNY's Quickbooks records and pulled the expenses related to the litigation of this action.

4. Attached to this declaration is an exhibit summarizing the costs and expenditures made by the Worker Justice Center of New York in litigating the above referenced case. The summary chart also includes a cost of \$2,433.33 for the mediation. That number has been removed from the total costs as WJCNY will be reimbursed that cost directly from Defendants.

5. Attached to the summary chart are receipts and invoices of expenses. Column A of the chart identifies the WJCNY member who was responsible for the purchase, Column B identifies the date, Column C identifies the amount of the expenditure, Column D explains the purpose and/or reason for the cost and identifies the vendor when possible, Column E identifies the date stamped page number of the receipt. Any cost entry that does not reference a receipt in Column E was pulled from our Quickbooks data.

6. The total costs associated with litigating this case are \$6,357.71.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

June 4, 2020
Kingston, New York.

DocuSigned by:

Diana Saguilan

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Diana Saguilan

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